

United States Courts
Southern District of Texas
FILED

June 27, 2022

Nathan Ochsner, Clerk of Court

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

ABRAHAM JOSEPH

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CRIMINAL NO. 4:22-cr-285

CRIMINAL INFORMATION

The United States Attorney charges:

COUNT ONE
(Conspiracy 18 U.S.C. § 371)

A. INTRODUCTION

At all times material to this Criminal Information:

1. Defendant **ABRAHAM JOSEPH (“JOSEPH”)** and a co-conspirator whose initials are “PD” resided in Houston, Texas.
2. **JOSEPH** was the owner of a company called OnePoint, Inc. (“OnePoint”). PD was the facilities manager for the Victim Company’s manufacturing facilities in Houston, Texas.
3. From 2007 until 2019, **JOSEPH** conspired with PD in a bribery and bid rigging scheme to obtain construction and maintenance work at the Victim Company. **JOSEPH** submitted fake bids to the Victim Company through PD, who coordinated the submission of the fake bids to make it appear that OnePoint was

the low bidder. In exchange for OnePoint getting the Victim Company work, **JOSEPH** paid PD with millions of dollars and other things of value. PD also funneled other work to **JOSEPH**/OnePoint where **JOSEPH** paid PD a portion of the Victim Company's payments to OnePoint ("kickbacks"). When submitting invoices for payment to the Victim Company, **JOSEPH** failed to disclose to the Victim Company that he was submitting falsified bids, paying PD kickbacks from the Victim Company's funds, and had PD on OnePoint's payroll for a time. The Victim Company would not have paid the OnePoint invoices had it known about the falsified bids or the kickback payments to PD.

B. THE CONSPIRACY

5. From at least in or around 2007 through in or around 2019, in the Houston Division of the Southern District of Texas and elsewhere,

ABRAHAM JOSEPH

the defendant, and others known and unknown, did knowingly combine, conspire, confederate, and agree with others known and unknown, to commit mail fraud, in violation of Title 18, United States Code, Section 1341.

6. It was a part and object of the conspiracy that defendant, and others known and unknown, did knowingly and willfully devise, and intend to devise, a scheme to defraud and for obtaining money and property by means of material false and fraudulent pretenses, representations, and promises, and for the purpose of

executing such scheme, did cause mail to be delivered by private and commercial interstate carriers, in violation of Title 18, United States Code, Section 1341.

C. MANNER AND MEANS OF THE CONSPIRACY

7. The defendant sought to accomplish the purpose of the conspiracy by, among other things, the following manner and means, among other things:

- a. **JOSEPH** submitted falsified bids to the Victim Company to make it appear that his company, OnePoint, was the low bidder on Victim Company construction and maintenance projects;
- b. **JOSEPH** submitted falsified bids to the Victim Company that were inflated at least by an amount necessary to pay kickbacks to PD;
- c. **JOSEPH** paid the Victim Company employee PD millions of dollars from the proceeds of Victim Company payments in exchange for PD coordinating fake bids and funneling work to **JOSEPH'S** company, OnePoint;
- d. When **JOSEPH** submitted invoices to the Victim Company for payment, he failed to inform the Victim Company that he was submitting falsified bids and that he was paying the Victim Company employee PD a portion of the Victim Company payments in exchange for PD funneling work to **JOSEPH'S** company, OnePoint, causing the Victim Company to mail millions of dollars in check payments to OnePoint.

D. ACTS IN FURTHERANCE OF THE CONSPIRACY

To achieve the purpose of the conspiracy, the defendant and other co-conspirators in the Southern District of Texas and elsewhere, committed and caused to be committed the following acts in furtherance of the conspiracy, including knowingly causing mail to be delivered by a private and commercial interstate carrier as set forth below:

ACT/PARAGRAPH	DATE	DESCRIPTION
8	8/27/2007	Mail matter containing a check delivered to the Southern District of Texas
9	7/6/2008	Mail matter containing a check delivered to the Southern District of Texas
10	3/9/2009	Mail matter containing a check delivered to the Southern District of Texas
11	5/6/2010	Mail matter containing a check delivered to the Southern District of Texas
12	3/11/2011	Mail matter containing a check delivered to the Southern District of Texas
13	11/29/2012	Mail matter containing a check delivered to the Southern District of Texas
14	7/8/2013	Mail matter containing a check delivered to the Southern District of Texas
15	3/24/2014	Mail matter containing a check delivered to the Southern District of Texas
16	8/6//2015	Mail matter containing a check delivered to the Southern District of Texas

17	2/18/2016	Mail matter containing a check delivered to the Southern District of Texas
18	12/20/2017	Mail matter containing a check delivered to the Southern District of Texas
19	1/18/2018	Mail matter containing a check delivered to the Southern District of Texas
20	6/19/2019	Mail matter containing a check delivered to the Southern District of Texas

In violation of Title 18, United States Code, Section 371.

JENNIFER B. LOWERY
United States Attorney

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